

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

PAULA F. SOTO,)
Plaintiff,)
v.) C.A. No.13-10822
CITY OF CAMBRIDGE,)
Defendant.)

)

**AFFIDAVIT OF CITY OF CAMBRIDGE
POLICE COMMISSIONER ROBERT C. HAAS**

I, Robert C. Haas, am the Commissioner of the City of Cambridge (the "City") Police Department and hereby certify that the following statements are true and accurate to the best of my knowledge, belief, and records.

1. On May 18, 2015, the City of Cambridge City Council amended City of Cambridge Ordinance Chapter 9.04 (the "Ordinance"). The Ordinance no longer prohibits the posting of non-commercial handbills, poster, advertisements or notices on private property and hence the posting of such items on privately owned motor vehicles in the public way is no longer prohibited by the Ordinance.
2. The Ordinance is the only written expression of the City's policy, custom or practice relative to the posting of non-commercial speech on private property.
3. As a result of the amendments to the Ordinance, the City no longer has a policy, custom or practice of prohibiting the placement of non-commercial fliers on motor vehicles parked on the public way, pursuant to the Ordinance.

4. The City does have a policy, custom and/or practice of responding to and investigating citizen complaints about alleged violations of law.

5. As noted previously to the Court, the City's police officers have a policy, custom and/or practice of enforcing the laws of the Commonwealth as they are required to do.

THE FOREGOING STATEMENTS ARE MADE UNDER THE PAINS AND PENALTIES OF PERJURY ON THIS 26th DAY OF OCTOBER 2015.



Robert C. Haas, Commissioner of the City of Cambridge Police Department

CERTIFICATE OF SERVICE

I, Samuel A. Aylesworth, hereby certify that this document, filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on this 26th day of October 2015.

s/ Samuel A. Aylesworth